

**UNITED STATES BANKRUPTCY COURT
NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION**

RE: MARGARITA BORD)	Case No. 22 B 13647
MICHAEL MELIKHOV)	
)	Chapter 13
Debtor(s))	
)	Judge: DONALD R CASSLING

AMENDED TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN

COMES NOW Thomas H. Hooper, Chapter 13 Trustee duly appointed to administer the instant case ("Trustee"), and hereby OBJECTS to confirmation of the Chapter 13 plan filed by Debtor(s), in advance of the confirmation hearing set for February 09, 2023 10:00 am, for the following:

Debtor has failed to provide copies of 60 days of pay advices and/or other evidence of income in accordance with 11 U.S.C. §§ 521(a)(1)(B), 1325(a)(1). Missing 60 days pay advices prior to filing for both of them.

Debtor has failed to provide proof of contribution from son and proof of business income in accordance with 11 U.S.C. Section 1325(a)(6).

The Trustee requests a comparative market analysis for debtor's home located at 1680 Charles, Wheeling, Illinois. The liquidation analysis of 11 U.S.C. 1325 (a)(4) cannot be completed until this is resolved.

Amend Schedule I to list additional income as per 341 meeting testimony and file attachment to line 8a of that schedule in accordance with 11 U.S.C. Section 1325(a)(6).

Amend plan improperly orders Fifth Third Bank to release lien after discharge in accordance with in 11 U.S.C. Section 1325(a)(1).

WHEREFORE, the Trustee prays the Court to enter an Order denying confirmation of the proposed Chapter 13 plan, and for such other and further relief as the Court may deem just and proper. In the alternative, the Trustee requests a hearing on the matter.

Dated: January 13, 2023

/s/ Thomas H. Hooper

Thomas H. Hooper
Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900

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CERTIFICATE OF SERVICE

I, Emily Baez, do hereby certify that I am, and at all times hereinafter mentioned was, more than eighteen (18) years of age; and that on the date indicated herein below, I served copies of the foregoing TRUSTEE'S OBJECTION TO CONFIRMATION OF PLAN by depositing a copy of the same in a postage-paid envelope with the United States Postal Service or by electronic means, as indicated.

DAVID FREYDIN <i>Attorney for Debtor</i>	(via CM/ECF)
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Patrick Layng United States Trustee	(via CM/ECF)
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MARGARITA BORD 1680 CHARLES WHEELING, IL 60090 <i>Debtor</i>	(via U.S. Postal Service)
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Dated: January 13, 2023

/s/ Emily Baez

Emily Baez
Office of the Chapter 13 Trustee
55 E. Monroe St., Suite 3850
Chicago, IL 60603
(312) 294-5900